

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**CASE NO.: 03-CR-10331 (RGS)**

**vs.**

**IVAN VELEZ,**

**Defendant.**

**STIPULATED MOTION TO CONTINUE SENTENCING**

**COMES NOW** the defendant, Ivan Velez, by and through undersigned counsel, and files this his Motion to Continue Sentencing scheduled for Wednesday, June 21, 2006 at 3:30 p.m., and, as good grounds, states as follows:

1. The undersigned's wife is pregnant and due on July 18, 2006. The undersigned does not wish to travel prior to the due date as the pregnancy, which is her first, has been difficult.
2. In addition, AUSA Suzanne Sullivan will be getting married the week of July 24<sup>th</sup> and joins in the instant motion.
3. The Defendant does not object to the granting of the instant motion.

**WHEREFORE** the defendant prays this Honorable Court reschedule this matter for the afternoon of Tuesday, September 19, 2006.

**DATED** this 6th day of May 2006.

Respectfully submitted,

**PERCY MARTINEZ, P.A.**

Attorneys for the Defendant VELEZ

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By: 

Percy Martinez, Esq.

FL Bar No: 981990

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing motion was mailed/faxed to **Suzanne M. Sullivan**, Assistant United States Attorney at the Office of the United States Attorney, Boston, Massachusetts on this 5<sup>th</sup> day of May 2006.

By: 

Percy Martinez, Esq.